

### REMARKS/ARGUMENTS

Claims 1-53 are now pending in this application. The office action mailed June 02, 2003 rejected claims 1-53. For at least the reasons discussed in detail below, all of the pending claims are patentable and in condition for allowance.

#### I. Claim Rejections under 35 U.S.C. §103.

Claims 1-3, 5-16, 19-30, 37, 39, 48, and 50 were rejected under 35 U.S.C. §103(a) as obvious and unpatentable over U.S. Patent No. 6,021,412 to Ho et al (hereafter Ho) in view of U.S. Patent 6,108,674 to Murakami et al. (hereafter Murakami). Claims 4, 18, 31-36, 38, 40-47, 49, 51-53 were rejected under 35 U.S.C. §103(a) as obvious and unpatentable over Ho and Murakami in view of U.S. Patent 5,493,677 to Balogh et al (hereafter Balogh). In addition, claims 51-53 were rejected under 35 U.S.C. §103(a) as obvious and unpatentable over Ho in view of Balogh. Applicant respectfully traverses the rejection under 35 U.S.C. §103.

Independent claim 1, subparagraph (a), teaches automatically creating a query directly from [an] indicated object, the query having a data structure that is recognizable by a search engine for the database. (Emphasis added). Similarly, independent claims 5, 48, 50, and 51 include substantially similar limitations.

As taught in the specification, various types of objects can be indicated in a document, including, but not limited to, a sentence, paragraph, and image. The query is then created directly from the indicated object. (See page 14, lines 8-10).

In contrast, the art of record fails to teach or suggest at least this limitation. Ho discloses a method for creating a query by “identifying a concept expressed by the ... text” (see column 9, lines 39-40). The concepts are identified by “parsing the portion of the text to identify words

that correspond to words in a list of concept words” (see column 9 lines 61-63). Figure 4 shows employing an “AutoClipArt” facility in a presentation application to activate the method disclosed by Ho. After the method is invoked, the steps for creating a query, as shown in Figure 5, include identifying each occurrence of a concept-matching word in a document (501), generating a list of the concept lemmas (502), prompting the user to select a concept lemma (503), identifying representative synonym (505), querying graphics library (506), and displaying the graphics (507).

As indicated by steps 502 and 503 in Figure 5, Ho creates a query for images based on a concept lemma that is indirectly selected. Ho’s concept lemma is not a portion of the text in the document that is selected by a user. Instead, a list of concept lemmas is generated by analyzing the entire document; and these generated concept lemmas are provided to the user for selection. A query for images is generated based on the selected concept lemma. Clearly, Ho’s process for creating the query employs an indirectly generated concept lemma and not an indicated object in a document as taught by Claim 1, subparagraph (a). Thus, Ho does not teach or suggest all of the claim limitations of the Applicant’s invention, as found in independent claims 1, 5, 48, 50, and 51, and therefore, for at least this reason, Ho is improperly relied upon to make these claims obvious.

Moreover, as further taught in the specification, indicated objects include objects that, among other things, may be “indicated” based on (a) highlighting of text (see page 8, lines 17-19) and (b) a word nearest to a cursor (see page 9, lines 1-3).

Neither Ho, nor Marukami, teach or suggest this limitation. As indicated above, Ho merely creates a list of concept lemmas. Marukami employs a word retrieval unit to sequentially

retrieve from a document, from its head to its end, respective document rows of each single clause within the document (see column 4 lines 28-33). Thus, Ho in view of Marukami does not teach or suggest this limitation, and therefore, for at least this reason, Ho and Marukami are improperly relied upon to make these claims obvious.

Additionally, Claim 1, subparagraph (b), teaches providing the query to the search engine, the search engine searching the database for at least one object that is related to the indicated text. The query provided to the search engine includes enough information about the indicated object so that a related image can be searched for in a database.

In contrast, Ho discloses a method where a facility uses a query to search a graphics library for matching representative synonyms (see column 6, line 7-9). The results of the query are dependent on the subsequent matching of representative concept synonyms (see column 1, lines 64-67). Since Ho's query and synonym search are substantially different than searching for objects that are related to an indicated object, the cited reference does not make obvious at least this aspect of claimed invention.

Furthermore, Claim 1, subparagraph (d), teaches producing a display of a related object, so that the related object may be associated with the indicated object. The displaying of the related object enables its association with the indicated object from which the query was originally created.

In contrast, Ho discloses displaying images that match concept lemmas and enabling the user to insert the returned images in a document that was previously analyzed to indirectly generate the concept lemmas. Clearly, Ho displays a returned image from a query based on concept lemmas that are at least one step removed from the document; and the cited reference

does not provide for enabling the association of this returned image with an indicated object in the document that was originally used to create the query. Therefore, the claimed display and association of the related object to the indicated object is not made obvious by the Ho reference.

As stated above, independent Claims 5, 48 and 50 are somewhat similar to independent Claim 1. Claim 5 is directed toward a method for searching, obtaining, and displaying images that are related to the indicated text in a document. Claim 48 relates to a system with a client-server architecture that implements actions substantially similar to the method taught in Claim 1. Claim 50 involves a computer readable medium having computer-executable components that implement actions substantially similar to those in Claim 1. Since independent Claims 5, 48 and 50 are substantially similar to Claim 1, these claims are not made obvious for at least the same reasons in regard to Claim 1.

Additionally, Claim 48, subparagraph (a), part (i) teaches enabling an automatic creation of a query directly from the indicated text. The created query has a data structure that is recognizable by a search engine for the database. The query can be created directly from the indicated text. (See page 14, lines 8-10).

In contrast, Ho discloses a requirement for "identifying a concept expressed by the ... text". (See column 9, lines 39-40). The concepts are identified by "parsing the portion of the text to identify words that correspond to words in a list of concept words". (See column 9 lines 61-63). In Figure 5, the Ho reference illustrates steps where the concept matching words are identified (step 501), mapped to concept lemmas (step 502), and lemmas are mapped to concept representative synonyms (step 505) all before a query is performed on the database (step 506). Therefore, the Ho reference does not make obvious this aspect of Claim 48.

Additionally, Claim 48 subparagraph (a) part (ii) teaches providing a query to a search engine that searches a database for an image that is related to indicated text. It is the query provided to the search engine that describes the indicated text in such detail that a related image may be located. In contrast, Ho discloses a facility that queries a graphics library to search for matching representative synonyms (see column 6, line 7-9). The query is directed to finding images that have concepts that match a list of synonyms from a document. The results of the query are dependent on matching representative concept synonyms (See column 1, lines 64-67). The claimed invention searches for images that are related to the indicated text, while Ho discloses searching for images that match concepts via synonyms. Therefore, the Ho reference does not make obvious this aspect of Claim 48.

Also, Claim 48, subparagraph (a) part (iii) teaches enabling a display of at least one related image indicated by the result from the query. The display of a related image is selectable for insertion into the document. By enabling the display of the related object, it can be associated with the indicated text from which the query was originally created.

In contrast, Ho displays images that match concept words so that a user may select them for insertion into a document. Because the Ho reference gleans its concept words by scanning the entire document, it does not allow the association of indicated text with a related image as taught by the claimed invention. Thus, this aspect of Claim 48 is not made obvious by the Ho reference.

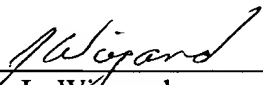
Additionally, dependent Claims 2-4, 6-47, 49, and 52-53 are not obvious for at least the same reasons as discussed above in regard to the independent claims, upon which they depend.

**CONCLUSION**

In summary, Applicant's claimed invention is not obvious in view of the cited prior art. For at least the reasons noted above it is respectfully submitted that all claims are patentable and that the application is in condition for allowance and should be passed to issue at an early date. Should any further aspects of the application remain unresolved, the Examiner is invited to telephone applicant's attorney at the number listed below.

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Respectfully submitted,

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